

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION**

IN RE:
Di Marie Cameron

CHAPTER 13
CASE NO. 14-11897-JNF

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

Now comes SRMOF II 2011-1 Trust and files its Objection to Confirmation of the Debtor's Chapter 13 Plan. In support thereof, SRMOF II 2011-1 Trust states as follows:

1. SRMOF II 2011-1 Trust is the holder of the first mortgage on the Debtor's property located at 286 Forest Avenue, Brockton, MA 02301-5054 (the "Property").
2. The mortgage to SRMOF II 2011-1 Trust is in default with an approximate pre-petition arrearage of \$67,176.17 and an unpaid principal balance of \$188,075.20. By the filing of its Objection, SRMOF II 2011-1 Trust sets forth its demand for payment and intent to hold the Debtor liable for the debt. The Proof of Claim bar date is September 8, 2014.
3. The Debtor's Plan fails to provide for the payment of SRMOF II 2011-1 Trust's pre-petition arrearage, and instead states that the Debtor is seeking a loan modification.
4. The Debtor cannot base a Chapter 13 Plan on a loan modification that has not been finalized.

WHEREFORE, Federal SRMOF II 2011-1 Trust respectfully requests that the Court deny confirmation of the Debtor's Chapter 13 Plan or for such other relief as the Court deems just and proper.

Respectfully submitted,
SRMOF II 2011-1 Trust
By its Attorney,

/s/ Tatyana P. Tabachnik
Tatyana P. Tabachnik, Esquire
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Dated: May 30, 2014

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CERTIFICATE OF SERVICE

I, Tatyana P. Tabachnik, Esquire, state that on May 30, 2014, I electronically filed the foregoing Objection to Plan with the United States Bankruptcy Court for the District of Massachusetts using the CM/ECF System. I served the foregoing document on the following CM/ECF participants:

John Fitzgerald, Esquire, Assistant U.S. Trustee (USTPRegion01.BO.ECF@USDOJ.GOV)
Carolyn Bankowski, Esquire, Chapter 13 Trustee (13trustee@ch13boston.com)
John F. Sommerstein, Esquire for the Debtor (jfsommer@aol.com)

I certify that I have mailed by first class mail, postage prepaid the documents electronically filed with the Court on the following non CM/ECF participants:

/s/ Tatyana P. Tabachnik
Tatyana P. Tabachnik, Esquire
BBO#67323

Di Marie Cameron
286 Forest Avenue
Brockton, MA 02301